

PSJ3
Exhibit 372



July 25, 2007

Joseph T. Rannazzisi (OD)
Deputy Assistant Administrator
Office of Diversion Control
Drug Enforcement Administration
Room E6295
2401 Jefferson Davis Highway
Alexandria, VA 22301

Dear Deputy Assistant Administrator Rannazzisi:

The Healthcare Distribution Management Association (HDMA) is the national trade association representing full-service distribution companies responsible for ensuring that billions of units of medication are safely distributed to tens of thousands of retail pharmacies, hospitals, nursing homes, clinics, and other provider sites across the United States. As such, our members are regulated under the Controlled Substances Act (21 U.S.C. § 801, et. seq.) and are thus directly affected by the Drug Enforcement Administration's (DEA) policies and procedures to reduce the misuse and diversion of controlled substances.

Both the DEA and the regulated industry, including HDMA members, have long fought the battle against diversion of controlled substances from legitimate channels. For example, the wholesale distributors have implemented strict security measures and established systems to make sure that customers are appropriately registered with the DEA. Unfortunately, the environment in which drugs may be diverted continues to evolve and we are aware that technology, including the Internet, has provided new avenues for individuals to attempt to unlawfully obtain or divert controlled substances.

HDMA and our members appreciate and fully support the DEA's goals of eliminating the flow of controlled substances into the hands of those who are not authorized to handle them or to patients who are not under appropriate physician care.

I am writing to request a meeting with you because of our concern of a lack of clarity between the DEA and our members as to the obligations to ensure the substances transferred to pharmacy customers are not destined for diversion. We understand that the DEA has met with some, but not all, of our members regarding the DEA's "Internet Distributor Initiative." We would particularly like to discuss educational efforts and guidances provided to members of HDMA intended to aid distributors in meeting such obligations, as well as the DEA's follow-up, judicial actions and other measures. Our objective is to find an effective process for the DEA and our members to achieve the common goals of reducing the potential for diversion in a less adversarial environment.

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HDMA has a history of successfully working with the DEA on a number of healthcare issues, most notably in assisting with the DEA's recent efforts to develop a final rule on the Controlled Substances Ordering System (CSOS). At your earliest convenience, I would very much appreciate a meeting with you to discuss how we might jointly continue efforts leading to positive health outcomes.

I look forward to meeting with you, and will contact your office next week to follow-up this request. In the meantime, please do not hesitate to contact me by phone at 703-885-0233 or e-mail at melville@hdmanet.org. Anita Ducca, Senior Director, Regulatory Affairs and Healthcare Policy, can also be reached at 703-885-0240 or aducca@hdmanet.org. HDMA stands at the ready to assist you and the DEA. Thank you in advance for your time and consideration.

Sincerely,



Scott M. Melville
Senior Vice President, Government Affairs